UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

THE UNITED STATES OF AMERICA)
Plaintiff,)
vs.)
) 4:16 CR 471 RWS
TANKADA YONG)
TAMARA JONES,)
Defendant.))

<u>DEFENDANT JONES' MOTION LEAVE OF COURT TO ACCESS</u> SEALED BENCH CONFERENCE

Comes now Defendant TAMARA JONES, by and through her attorney of record, JoAnn Trog, and for her Motion for Leave of Court to Access Sealed Bench Conference, states as follows:

- Defendant previously requested and was provided this date a copy of her
 Change of Plea Hearing which occurred June 23, 2017.
- Contained within the Transcript provided Counsel is notice that a Bench
 Conference was placed under seal pursuant to Local Rule 13.05.
- 3. Defendant would request that she be provided a copy of that portion of the Change of Plea Hearing conducted under seal.
- 4. That there is currently pending a Motion to Withdraw Plea to be heard on Thursday, November 9, 2017, and, therefore, it is deemed necessary that Defendant's counsel be provided that portion of the record which was filed under seal.

5. Undersigned counsel believes that in light of the circumstances, this request is not prejudicial to any party and that the ends of justice would be best served by the granting Defendant's request for that portion of the Change of Plea Hearing filed under seal.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that this Court issue its Order allowing Defendant to be provided a copy of the sealed portion of the Change of Plea Hearing, and for such other and further Orders as the Court deems appropriate in the premises.

Respectfully submitted,

/s/ JoANN TROG
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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Thomas C. Albus, Assistant United States Attorney, 111 South 10th Street, 20th Floor, St. Louis, Missouri 63102.

/s/ JoANN TROG